

August 8, 2002

Ms. Karen L. Kaufman, Standardization Section, Processed Products Branch Agricultural Marketing Service – U. S. Department of Agriculture 1400 Independence Avenue SW., Room 0709 South Building; STOP 0247 Washington, DC 20250

Dear Ms. Kaufman:

This correspondence is in regard to the Agricultural Marketing Service's (AMS) June 10th request for public comments regarding amendment of the United States Standards for Grades of Grapefruit Juice [Docket Number: FV –02-336].

The Florida Citrus Processors Association, founded in 1931, is a non-profit trade association representing the citrus juice manufacturers of Florida. It is our mission to represent, communicate, protect and enhance the interests of our members, and to promote the growth and welfare of the citrus industry. Our members, comprised of major brands, private label and bulk processors, utilize more than 90% of the Florida orange and grapefruit crop.

The Florida Citrus Processors Association is strongly opposed to amending the United States Standard for Grades of Grapefruit Juice. The petition which AMS received from the Indian River Citrus League speaks to the Florida Department of Citrus (FDOC) "Gold Standard" grade specification replacing the current Grade "A" minimum standard. As the "Gold Standard" is not a recognized industry standard nor has it been recognized by the Florida Citrus Commission or the Florida Department of Citrus, there is no basis to adopt said standard. As you are aware, the current U. S. Grade Standard does not prevent the packing of product to higher quality parameters.

The FCPA has long endorsed high quality grapefruit juice products and the current U. S. standard has enabled the trade and consumers to enjoy these products. Inasmuch, the Florida Citrus Processors Association respectfully requests that AMS not open this subject for the promulgation of amendment.

Sincerely,

Executive Vice President

LYR/II

Co:

FCPA BOD Robert Keeney, AMS